

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

GEORGE MANDALA and CHARLES BARNETT,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

NTT DATA, INC.,

Defendant.

Case No. 6:18-cv-06591-CJS

**DECLARATION OF PATRICIA  
PRICE**

**Patricia Price**, of full age, hereby declares as follows:

1. I am employed by Defendant NTT DATA, Inc. as a Senior Recruiter. In my role, I am responsible for recruiting for various NTT DATA job postings and engaging with potential candidates. I have personal knowledge of the matters contained herein and submit this Declaration in support of NTT DATA's Motion to Dismiss the Class Action Complaint in its Entirety and with Prejudice.

2. I am the recruiter that worked with Plaintiff George Mandala when he applied for a position with NTT DATA, Inc.

3. I reviewed a copy of the Class Action Complaint filed in the above-referenced matter. In Paragraph 30 of the Class Action Complaint, Plaintiffs allege, in part, that "Mr. Mandala authorized a background check...".

4. Attached hereto as **Exhibit A** is a true and correct copy of the signed background check authorization form that I received from Plaintiff George Mandala, which is referenced in Paragraph 30 of the Class Action Complaint.

5. As noted in the executed authorization, Plaintiff George Mandala acknowledged receipt of Article 23-A of the New York Correction Law. (Exhibit A).

I declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the foregoing statements made by me are true and correct.

Executed on November 12, 2018

  
Patricia Price